

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR  
BENGULESCU, GERALD BEZEMS,  
SCOTT CROCKETT, RIFAT  
GORENER, CHRISTOPHER LESIEUR,  
LAWRENCE MARCUS, and MIKHAIL  
SULEYMANOV, individually and on  
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,  
BAVARIAN MOTOR WORKS, and  
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

**CLASS ACTION**

**SUPPLEMENTAL DECLARATION OF MATTHEW D. SCHELKOPF IN  
SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

I, Matthew D. Schelkopf, declare as follows:

1. I am a member of the law firm of Sauder Schelkopf LLC, and proposed Settlement Class Counsel for Plaintiffs in the above-captioned action. I am admitted to practice before the Supreme Courts of Pennsylvania and New Jersey. I submit this Supplemental Declaration in Support of Plaintiffs' Motion for Final Approval of the Class Action Settlement.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a letter sent by Lemberg Law to a putative Settlement Class Member. My firm received this letter on June 11, 2018.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the letter received from John Cook that was originally sent to the Settlement Administrator and then forwarded to my firm.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the letter signed by John Cook whereby Mr. Cook agreed that he misunderstood the terms of the Settlement and, after conferring with me about the Settlement, agreed to withdraw his objection.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 7, 2018

Respectfully submitted,

By: /s/ Matthew D. Schelkopf  
Matthew D. Schelkopf  
Joseph B. Kenney  
**SAUDER SCHELKOPF LLC**  
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**CERTIFICATE OF SERVICE**

I, Matthew D. Schelkopf, hereby certify that on September 7, 2018, the foregoing declaration was filed via the Court's ECF filing system, thereby electronically serving it on all counsel of record.

/s/ Matthew D. Schelkopf  
Matthew D. Schelkopf